



Oregon Public Utility Commission  
201 High Street SE, Suite 100  
Salem, OR 97301-3398

August 21, 2020

Oregon PUC UM2005 Staff

**RE: Response to Stakeholder Questions for August 25, 2020 Special Public Meeting discussion**

Thank you for the opportunity to submit responses. Below are OSEIA's responses.

1. What kind of actionable baseline data and system assessment information should be included in the first utility DSP plans in order to help parties reach a shared understanding of the current state of the distribution systems?

**Each utility DSP should include the following elements**

- 1) Peak demand by circuit and transformer bank for the previous year and five subsequent years.**
- 2) A grid needs assessment (GNA) that identifies capital investments over the next three years. The GNA should provide facility identifiers and facility type (substation, line segment etc.). The GNA should include:**
  - a. The primary driver of the investment (e.g. demand growth, age of infrastructure.**
  - b. The distribution service needed (capacity, voltage support, reliability improvement)**
  - c. Magnitude of the deficiency**
  - d. In-service date of upgrade**
  - e. Equipment rating (e.g. MW, amps Vpu)**
  - f. Cost estimate**
- 3) Distribution projects that have the potential for deferment. Screening for project deferment should include information about**
  - a. Timing of need (month, hours)**
  - b. Duration of the need**
  - c. Magnitude of the need**
  - d. Number of need events per year**

2. When considering the first utility DSP plans, is a "bottom-up" DER/EV forecasting methodology worth the likely additional cost when compared to a "top-down" forecasting methodology? Why or why not?

**DSP plans should drive to use both top-down and bottom-up forecasting. Comparison and calibration of the results will provide more reliable information over time. Top-down forecasting may be appropriate for the first DSP and utilities migrate data from their IRP to the DSP. Utilities should make best efforts to disaggregate the top-down forecast to more granular units.**



3. When considering the first plans utilities file, what are likely to be the best uses for HCAs, and in what ways would your organization use them? For example, to screen projects (as a partial substitute for interconnection studies)? To help utility customers understand the general state of their feeder? For researching the overall opportunity for DERs in a given area?

**Utilities should plan to develop hosting capacity analyses by line segment. Even though it may take more time to prepare a more granular approach it is worth the effort and helps set up a longer term process of continual improvement. Utilities may be able to reduce costs of hosting capacity analysis by using more probabilistic tools that may be less accurate than an iterative approach.**

**An initial use case for the hosting capacity analysis for our organizations membership will be for the screening of projects. A subsequent use case will be as a partial substitute for interconnection studies. A third use case will be for local and regional systems planning.**

What form of data presentation would your use benefit from (e.g. raw, tabular data or visualized on a map)?

**Data should be presented in tabular (spreadsheet) form and by a mapping visualization tool. Raw data should be available upon request.**

4. How could a Community Engagement Plan and process lead to improved distribution project outcomes for residents, business owners, and stakeholders in impacted areas?

**Community Engagement Plans should seek out partnerships with Community-based organizations (CBOs) at the beginning of project conceptualization. CBOs should be treated as full partners in the design of outreach projects as they offer the representation, perspective and experience of the community of rate payers being served.**

When should community engagement around a project begin?

**The engagement needs to begin with the needs assessment. Each utility should engage CBOs at the needs assessment phase in a way that allows for CBO input on the needs. Utilities should clearly communicate the basis of utility needs for the project, a clear set of alternatives for consideration and be open to refinement or expansion of the needs as a result of meaningful CBO feedback. The utilities should recognize that communities may be able to identify solutions the distribution system planners did not consider.**

What is a practical “project threshold” to determine which projects warrant this?

**Projects that may; disrupt the activities of a community during construction, result in permanent visible or audible changes to a neighborhood, result in permanent restrictions to public access of previously unrestricted spaces or result in utility investments (at rate payer expense) in pinch point infrastructure sized to accommodate only utility owned or contracted flows warrant engagement.**



What metrics, evaluation and reporting should be required?

**At a minimum the utilities should report on which CBOs have been engaged in needs assessment scope, project design and implementation. Minutes should be kept of meetings with the community including comments and recommendations of community members.**

How might the PUC support utilities to develop and showcase projects co-created with community partners?

**The PUC could consider developing a best practice manual for community engagement. The PUC could identify third-party facilitators for community engagement processes.**

5. In what ways do stakeholders foresee DSP affecting utilities' current business model?

**DSP should result in more contracting with third-parties for the provision of distribution services allowing utilities to focus on operations, maintenance and planning efficiencies and optimization. Third party services supplied by parties focused on energy security, best available technology integration and specific lanes of technological expertise (in areas such as battery storage systems and customer response through load shifting or curtailment of activities) would reduce stresses on utility staffing, expedite solution integration and ultimately result in savings to both rate payers and utilities.**

**Contracting for these services may reduce the need for capital investment by the utility and reduce earning opportunities on those assets. However, a well designed DSP process will reduce project design timelines, utility staff strain and rate payer burden while increasing system reliability (ie, reduce utility risk, response to interruption expense and loss of sales revenue) and rate payer satisfaction.**

Do these represent incentives to pursue DSP, or barriers?

**If utilities are required to supply reliable access to electricity through the current (and indefinitely projected) period of increasing frequency of catastrophic events while responding to increasing rate payer demand for choice and integration of best available technologies, then these all represent incentives to utilities to pursue DSP.**

**Additional incentives could be provided to utilities for the successful substitution of third-party services for conventional utility investments in the distribution system.**

Are there any changes that need to be made to Oregon's approach to regulation in order to succeed at advancing DERs cost-effectively?

**Compulsion of IOU's to incorporate third party validation of DSP plans, needs assessments, solicitations and interconnection studies would all accelerate, economize and advance cost effective DER adoption.**

**Performance-based regulation would be supportive of efforts to more efficiently manage the distribution system provided that net benefit to rate payers is incorporated.**



Which barriers and uncertainties to long-term DSP are most significant from your perspective?

**Access to and transparency of utility data can is a barrier to the success of a DSP process in reducing the cost of service.**

**Customer privacy is an important consideration but should not become an impediment to DSP that engages stakeholders.**

6. What are your reactions to the overarching goals below? How are your needs reflected or missing? Do you recommend changes?

**OSEIA is pleased with PUC staff's goals as enumerated and stands willing and able to assist with the actualization thereof.**

Sincerely,

A handwritten signature in black ink that reads "Angela Crowley-Koch". The signature is fluid and cursive, with the first letters of each name being capitalized and prominent.

Angela Crowley-Koch  
Executive Director